

**United States Environmental Protection Agency
Region V
POLLUTION REPORT**

EPA Region 5 Records Ctr.



279555

Date: Friday, August 10, 2007

From: Sam Borries, OSC

To: Linda Nachowicz, epa
David Chung, EPA

Mike Harris, EPA
Paul Bucholtz, MDEQ

Subject: Kalamazoo River OU5 - Plainwell Impoundment
Plainwell & Kalamazoo, MI

POLREP No.:	2	Site #:	059BBB05
Reporting Period:	June 3, 2007 to July 28, 2007	D.O. #:	
Start Date:		Response Authority:	CERCLA
Mob Date:		Response Type:	Time-Critical
Completion Date:		NPL Status:	NPL
CERCLIS ID #:		Incident Category:	Removal Action
RCRIS ID #:		Contract #	

Site Description

Refer to POLREP #1 for site Description

Current Activities

During the week ending June 9, 2007, Arcadis BBL and its contractor, Terra Contracting (Terra), continued its work related to the construction and setup of the sediment staging and solidification area 1N, and continued its activities related to the grubbing of vegetation and trees at the 12th Street Dam location. Terra also began excavating sediment from Area 1, and the hauling of this sediment to the staging area.

Additionally, Arcadis BBL collected two soil samples (K25713 and K25714) from the material that Terra used for backfilling the excavated portions of the Kalamazoo River; two sediment samples (K55231 and K55232) from Area 1; and three water samples (K30608 - K30610) from the Kalamazoo River. Arcadis BBL also began taking turbidity readings from three locations in the Kalamazoo River (one upstream and two downstream of Area 1) (Note: Arcadis BBL will continue to take work area turbidity readings for the duration of the project per the approved Work Plan).

During the week ending June 16, 2007, Arcadis BBL collected five sediment samples (K55233 - K55237) from Area 1; two water samples (K30612 and K30613) from the river; recorded the positions of these samples with a GPS device; and continued taking turbidity

readings from three locations in the Kalamazoo River.

Terra worked on the pugmill, located in the staging area 1N, to determine how to best optimize its operation; continued its operations concerning the excavation of sediment from Area 1 and the hauling of this sediment to staging area 1N; initiated the construction of an access road to Areas 2A through 5A; and shipped 26 loads of non-TSCA-level sediment (1,216.13 tons) to the C & C Landfill in Marshall, Michigan.

During the week ending June 23, 2007, Terra re-excavated a portion of Area 1 which failed confirmation sampling and Arcadis BBL collected a follow-up sediment sample (K55238) from Area 1. Arcadis BBL also collected five other sediment samples (K55239 - K55243) from initial excavations in Area 1; collected two water samples (K30615 and K30616) from the Kalamazoo River; began surveying the excavated areas within Area 1 to ensure that Terra had excavated to the proper depth; and continued taking turbidity readings from three locations in the river.

Terra continued its operations concerning the excavation of sediment from Area 1 and the hauling of this sediment to the staging area; continued its construction of the access road for Areas 2A through 5A; began backfilling Area 1 in those areas where the analytical results were below the cleanup criteria of 4.0 ppm; and shipped 19 loads of non-TSCA-level sediment (791.25 tons) to the landfill. Note: On June 21, Terra suspended the excavation activities due to a puncture in the liner at Staging Area 1N. Terra repaired this puncture on June 22.

During the week ending June 30, 2007 Arcadis BBL collected sediment sample (K55244) from the TSCA section of Area 1, and split this sample with the EPA START oversight contractor (START designated sample number APS-062607-01-SD/K55244); Arcadis BBL collected three sediment samples (K55245 - K55247) from the TSCA section of Area 2A, and split one of these samples, K55245, with START (START designated sample number APS-062707-02-SD/K55245); and two water samples (K30618 and K30619) from the river; and continued to monitor the turbidity of the river water both upstream and downstream of the excavation area.

Terra initiated and completed the initial and follow-up excavation of the TSCA section of Area 1; initiated and completed the excavation of the TSCA section of Area 2A; worked in Staging Area 1N stabilizing material; and shipped 12 loads (593.24 tons) of non-TSCA-level sediment to the landfill and 17 loads (778.55 tons) of TSCA-level sediment to a waste disposal facility, Wayne Disposal, Incorporated, in Belleville, MI.

During the week ending July 7, 2007, Arcadis BBL collected three water samples from the influent (W-SA1N0Influ-001), mid-way point (W-SA1N-Midflu-001), and effluent (W-SA1N-Efflu-001) of the water treatment system located at the staging area. Arcadis BBL also collected three pre-construction soil samples (K25715 - K25717) from the southern bank access road Terra built north of the Wesco gas station, which is located on M-89 in Plainwell. Arcadis BBL also continued to monitor the turbidity of the river water both upstream and downstream of the excavation area, and collected two water samples (K30621

and 30622) from the river.

Terra began to place topsoil over the backfilled sections of Area 1; began grubbing Staging Area 2S and shoreline of the southern bank excavation areas; continued excavation activities in the non-TSCA sections of Area 2A; shipped 10 loads (588.80 tons) of non-TSCA-level sediment to the landfill and 10 loads (359.78 tons) of TSCA-level sediment to the waste disposal facility.

During the week ending July 14, 2007, Arcadis BBL collected three sediment samples from Area 2 (K55248 - K55250), five sediment samples from Area 3 (K55251 - K55255), two water samples from the river (K30624 and K30625), and one sample from the frac tank located at the staging area into which Terra placed the treated water. Arcadis BBL continued taking daily turbidity readings in the river.

MDEQ identified in-stream sediments along Area 1 of potential concern and collected 20 sediment samples from Area 1 and two sediment samples from Area 2A on July 2 and 3. Arcadis BBL GPS-located the 20 MDEQ sample collection points.

Terra excavated sediment from Areas 3A, 3A2, and 4A; conducted grubbing activities in Area 3B (south shore of the river directly across from Area 3) and the 12th Street Dam area; and shipped a total of 49 loads (2,344.18 tons) of non-TSCA-level sediment to the landfill.

During the week ending July 21, 2007, Arcadis BBL collected two sediment samples (K55256 and K255257) from Area 3A (START split sample designated as APS-071607-03-SD/K55256), ten sediment samples (K55258 - K55267) from Area 4A (START split sample designated as APS-071907-04-SD/K55263); two water samples (K30627 and K30628) from the river; and one soil sample (K25718) from the material that Terra will use for building the river access roads for Areas 3B and 4B. Additionally, Arcadis BBL conducted turbidity readings of the three locations in the river, and assisted in directing the excavation of MDEQ identified in-stream sediments of Area 1 by estimating the thickness of sediments in this area so that the Terra operator could excavate the necessary locations.

Terra excavated sediments from Areas 1 (in-stream), 3A, 3A1, 4A, and 5A; continued its grubbing activities in Areas 3B and 4B; initiated building an access road to Area 6A; shipped 40 loads (1,737.91 tons) of non-TSCA-level sediment to the landfill; and shipped five loads (213.25 tons) of TSCA-level sediment to the waste treatment facility.

During the week ending July 28, 2007, Arcadis BBL collected nine pre-construction soil samples (K25719 - K25727) from the section of land that will be used for Staging Area 2S; one sediment sample (K55268) from Area 4A, one sediment sample (K55269) from Area 3A1, one sediment sample (K55270) from Area 3A2, and two water samples (K30630 and K30631) from the river. Arcadis BBL also continued collecting turbidity readings in the river.

Terra initiated grubbing activities in Area 6A; continued building the access road to Areas 6A, 3B and 4B; excavated sediments from Areas 3A1, 4A, and 6A; building the Staging Area

2S; applied backfill to Area 1; installed a silt curtain around Area 6A; installed a permanent fence and gate at the access point to the 12th Street Dam area; and shipped nine loads (432.36 tons) of non-TSCA-level sediment to the landfill and one load (44.28 tons) of TSCA-level material to the waste disposal facility.

The MDEQ collected six sediment samples from Area 4A, on July 24, and nine sediment samples from Area 1, on July 25.

To date, Terra has excavated approximately 3,120 linear feet of the north shore of the Kalamazoo River

Planned Removal Actions

Refer to Pollution Report #1 for Plainwell Impoundment Removal Action requirements.

Next Steps

Continue the excavation of sediments from of Area 6A; collect sediment samples from Area 6A; begin restoration activities in Area 6A; continue taking turbidity readings from the Kalamazoo River; haul additional loads of impacted sediments to the C & C landfill in Marshall, MI; continue the road-building activities at the Staging Area 2S; and begin the excavation of sediments from Island 3 (Area 5A).

Key Issues

The progress of excavation activities as based on weather conditions and the extent of PCB contamination in Area 6A and Island 3.

The impact of public opinion on the progress made on the site activities.

An agreement was reached between USEPA, MDEQ, Millennium Holdings LLC and Georgia Pacific LLC to excavate intermittent waste residual material from approximately 400 feet of southern bank along the City of Plainwell Waste Water Treatment Plant designated as Area 2B.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	\$150,000.00	\$42,674.30	\$107,325.70	71.55%
Intramural Costs				
Total Site Costs	\$150,000.00	\$42,674.30	\$107,325.70	71.55%

the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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